

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Title V draft permit No. V-06-031
GRIEF INDUSTRIAL PACKAGING & SERVICES
Florence, Kentucky
August 24, 2006
REVIEWER: Sajjad Quabili
SOURCE I.D. #: 021-015-00010
SOURCE A. I. #: 272
ACTIVITY #: APE20050002

SOURCE DESCRIPTION:

Greif operates a container manufacturing facility at Florence. The process includes spray painting booths and paint drying ovens. Currently, Greif is holding a Title V operating permit for this plant.

COMMENTS:

Greif applied to the Division for the renewal of their Title V operating permit. The source is major for HAPs emissions and conditional major for VOC emissions. The allowable VOC emissions limit is less than 99 tons per year. Since the emission limit is proximity to the Title V threshold, Greif shall demonstrate the following record keeping and reporting requirements:

If total VOC emissions during any twelve-month period exceed 90 tons, the permittee will begin tracking annual emissions on a *weekly basis* beginning the following calendar month. Emissions will be tracked in this manner for three consecutive months, and monthly reports shall be submitted to the Florence Regional Office. If the rolling twelve-month totals remain less than 90 tons for three consecutive months, the permittee may return to *monthly tracking and semi-annual* reporting until such time as emissions may again exceed 90 tons for a rolling twelve-month total.

Note: weekly tracking will be accomplished by recalculating each of the applicable month's emissions from the prior year from a monthly total to weekly totals, and compared with the weekly totals from the same week of the current year. For the purposes of this tracking, each month shall be broken down into 4 weeks as follows:

Week 1. Day 1 thru day 7
Week 2. Day 8 thru day 14
Week 3. Day 15 thru day 21
Week 4. Day 22 thru day 31

Applicable Regulations:

The affected facilities, **EP 01** and **EP 02** are exempt from the requirements of **401 KAR 61:132**, Section 3 if the VOC content of the coating is:

1. Less than 4.3 lb/gal, excluding water or exempt solvent or both, delivered to the applicators associated with clear coat;
2. Less than 3.0 lb/gal, excluding water or exempt solvent or both, delivered to the applicators associated with color coat or first coat on untreated ferrous substrate.

40 CFR 63: Subpart M applies to the surface coating operation of Greif's steel drum manufacturing plant. The coating operation includes spraying paints, surface preparation and cleaning. Greif is classified as an existing source per this subpart. The emission limit for this affected source is no more than 2.6 lb of organic HAP emission to the atmosphere per gal of coating solids used during each 12-month compliance period.

Compliance with the emission limit shall be demonstrated by utilizing *emission rate without add-on controls option*, §63.3891(b). The demonstration shall be based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operations, the organic HAP emission rate for the coating operations is less than or equal to allowable limit, calculated as a rolling 12-month emission rate and determined on a monthly basis.

The alternate operating scenario, *compliant material option*, §63.3891(a) is included in Section H. This option requires the permittee to demonstrate that the organic HAP content of each coating used in the coating operations is less than or equal to the emission limit of 2.6 lb organic HAP per gallon of coating solids used during 12-month compliance period, and that each thinner and/or other additive, and cleaning material used contains no organic HAP.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.